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January 9, 2020

Via ECF

Hon. William H. Pauley
U.S. District Court, S.D.N.Y.
c/o United States Courthouse – Room 221
500 Pearl Street
New York, NY 10007

Re: United States v. Michael Cohen
(18-cr-602 [W.H.P.])
(18-cr-852 [W.H.P.])

Dear Judge Pauley:

I respectfully write to Your Honor in the nature of an application pursuant to the Southern District Court's Electronic Case Filing Rules and Regulations Rule 6.1 to seek permission to file a single "Reply Affirmation" from Defendant Michael D. Cohen under seal. As you will note, Government counsel was provided with a copy of the application, and has consented to sealing paragraphs 6 through 27.

The reason for this application is to permit the filing of Mr. Cohen's Reply Affirmation discussing aspects of previously referenced proffer sessions containing information and details which involve third parties, and which, due to the pending of some of their cases (e.g. *United States v. Zuberi*), should not be in the public domain. There will, at minimum, be publicly filed Reply Affirmations from (1) Michael D. Cohen, and (2) myself.

Against this backdrop, I do not discern any discernible prejudice to either the Court, or the United States Attorney's Office, should this application be granted.

Very truly yours,



Roger Bennet Adler
Attorney for Defendant Michael D. Cohen

RBA/gr

Cc:

Via email

Assistant U.S. Attorney Thomas McKay
c/o Acting United States Attorney Audrey Strauss